

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth, ERS, and
HTA.**

2021 APR -6 PM 5:00
RECEIVED AND FILED
CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, PR

**CLAIMANT'S RESPONSE TO THE THREE HUNDRED AND FIRST
OMNIBUS OBJECTION**

Instructions

1. You should fill out and file this response form only if your claim relates to current or former employment with the government of Puerto Rico, or if your claim relates to a pending or closed legal action. If your claim does not arise from current or former employment with the Government of Puerto Rico, or if your claim does not relate to a pending or closed legal action, your response must be filed in accordance with the procedures detailed in pages 3-4 of the Notice accompanying the Three Hundred First Omnibus Objection.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Please file a separate response form for each proof of claim to which the Debtors have objected. Do not file a single response form addressing more than one claim.
3. Please answer all questions and any applicable sub-questions.
4. Please include as much detail as possible in your responses.
 - a. **Your answers should provide more information than the initial proof of claim.** For example, if you previously wrote “Act 96” as the basis for your claim, please elaborate as to the specific laws on which you are purporting to rely, the year the law at issue was enacted, and how and why you believe such particular law provides a basis for your claim.
 - b. If available and applicable to your claim, please provide:
 - Copy of a pleading, such as a Complaint or an Answer;
 - Any unpaid judgment or settlement agreement;
 - Written notice of intent to file a claim with proof of mailing; and
 - Any and all documentation you believe supports your claim.
5. If you do not have a copy of your claim, you may download a copy by visiting Prime Clerk’s website at: <https://cases.primeclerk.com/puertorico/Home-ClaimInfo>.
6. You must sign your response where indicated below. If you do not sign your response, the clerk will not accept it for filing.
7. Please file the completed form and any supporting documents as directed in the Notice accompanying the Omnibus Objection to your claim.

Questionnaire

1. Please provide a name, address, telephone number, and email address of either (1) the responding claimant; (2) the claimant’s attorney or designated representative to whom the attorneys for the Commonwealth, the ERS, or the HTA should serve a reply to the response, if any; or (3) the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on the claimant’s behalf.

☐ **Name:** José Ramón López Valentín

☐ **Address:** Urb. Monte Olivo 347 Calle Poseidon, Guayama, PR 00784-6639

☐ **Telephone number:** (787) 866-6021

☐ Email address: joselo195303@gmail.com

2. Your Proof of Claim number: 17 BK 3283-LTS - 3481

3. The Debtors have objected to your Proof of Claim because it does not provide sufficient information for the Debtors to understand the basis for your claim. Please check the box to which your Proof of Claim relates and explain the reason why you oppose the objection by explaining the basis for your claim. Attach additional pages if needed.

☒ A pending or closed legal action with or against the Puerto Rican government

☐ Current or former employment with the Government of Puerto Rico

There is a lawsuit under appeal by Alejo Cruz Santos Plaintiff Group, Claim 29642

Please attach a copy of any other documentation or other evidence in support of your claim.

4. What is the amount of your claim (how much money do you claim to be owed):

\$75,168.30

5. **Employment.** Does your claim relate to current or former employment with the Government of Puerto Rico?

☐ No. Please continue to Question 6.

☒ Yes. Answer Questions 5(a)-(d).

5(a). Identify the specific agency or department where you were or are employed:

Department of Transportation and Public Works

5(b). Identify the dates of your employment related to your claim:

1984 - 2014

5(c). Last four digits of your social security number: 9641

5(d). What is the nature of your employment claims (select all applicable):

☐ Pension

☒ Unpaid Wages

☐ Sick Days

☐ Union Grievance

☐ Vacation

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- ☐ Other (Provide as much detail as possible. Attach additional pages if necessary).

6. Legal Action. Does your claim relate to a pending or closed legal action?

- ☐ No.
☒ Yes. Answer Questions 6(a)-(f).

6(a). Identify the department or agency that is a party to the action.

Department of Transportation and Public Works

6(b). Identify the name and address of the court or agency where the action is pending:

Appellate Commission

6(c). Case number: Claim 29642

6(d). Title, Caption, or Name of Case: Alejo Cruz Santos Plaintiff Group

6(e). Status of the case (pending, on appeal, or concluded): On appeal

6(f). Do you have an unpaid judgment? Yes / No (Circle one)

If yes, what is the date and amount of the judgment? Yes, \$75,168.30

PLEASE SIGN YOUR RESPONSE BELOW


Signature

José Ramón López Valentín
Printed Name

April 1, 2021
Date

Copy

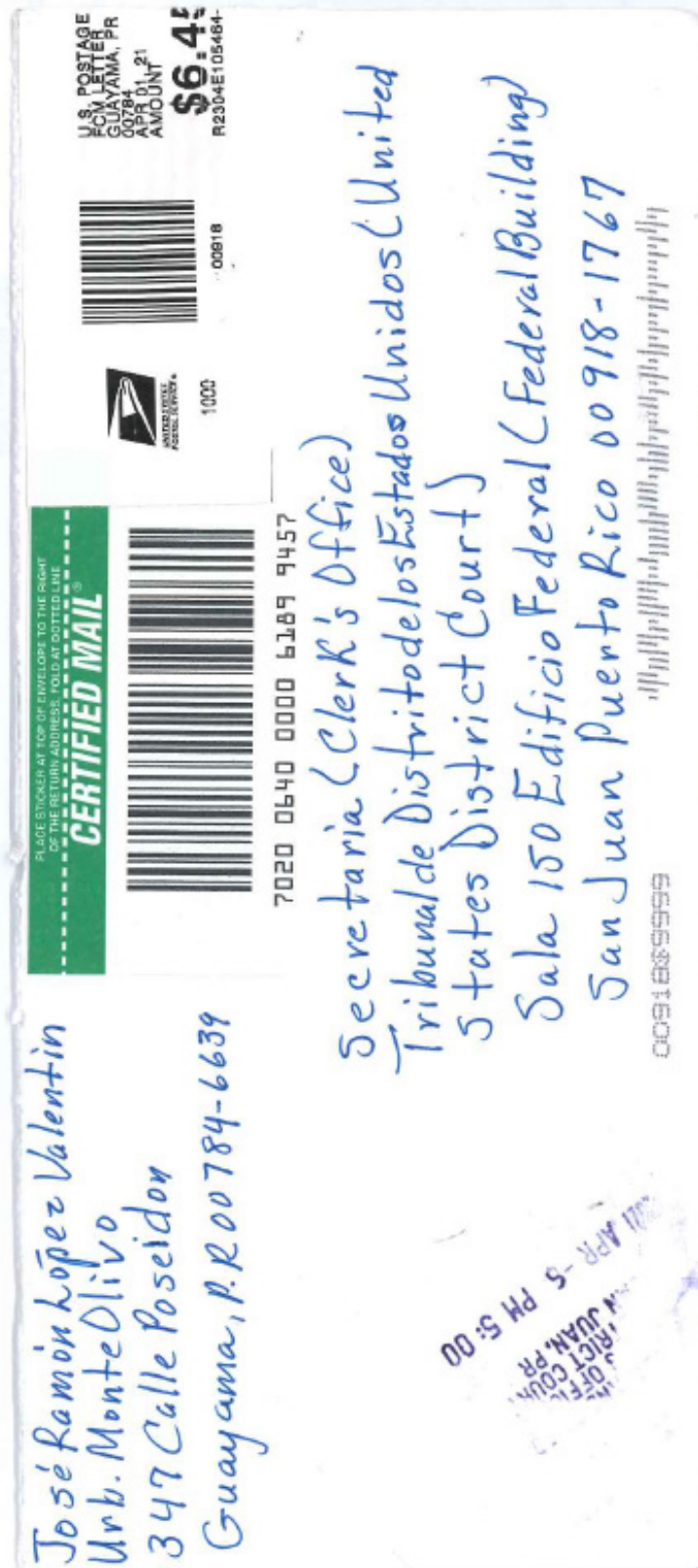
Case:17-03283-LTS Doc#:16345-1 Filed:04/06/21 Entered:04/07/21 10:56:41 Desc:

Case:17-03283-LTS Doc#:3505 Filed:07/13/18 Entered:07/13/18 11:30:34 Desc: Main

LOPEZ BONILLA LUIS ROBERTO	BARRIO PALMAR AGUADILLA, PR 00603	\$	32,914.43
LOPEZ CASTRO, WILSON	HC-11 BOX 12155, HUMACAO, PR 00791	\$	43,066.77
LOPEZ CASTRO, WILSON		\$	31,347.08
LÓPEZ COLÓN, JOSÉ D.	HC-71 BOX #1286, NARANJITO, PR 00719	\$	9,911.40
LOPEZ DE JESUS, CARMEN L.	URB. APRIL GARDENS C/12 H 28 LAS PIEDRAS, PR	\$	694.82
LOPEZ DE NEGRON, MARCELINA	DAMASCO F-12, ALTURAS VILLA DEL REY CAGUAS, PR 00727	\$	21,552.04
LOPEZ FUENTES, ANTONIO	HC-04 BOX 15440, MOCA, PR 00676	\$	30,871.83
LOPEZ FUENTES, JAVIER		\$	6,682.63
LOPEZ LOPEZ, JULIA	21 SECTOR FARALLON, BARRANQUITAS, PR 00794	\$	47,441.44
LOPEZ ORTIZ, MARIA ESTHER	AVE. ANDALUZ #2-D-24, LOMAS VERDES BAYAMON, PR 00956	\$	12,241.86
LÓPEZ PINET, GERMÁN	HC-01 BOX 4324, MEDIANIA ALTA LOIZA, PR 00772	\$	3,342.62
LÓPEZ RIVERA, PABLO	EDIF. #50 APT. 617, RES. VISTA HERMOSA	\$	6,875.04
LOPEZ RIVERA, PABLO		\$	7,836.77
LOPEZ RODRIGUEZ, LAURA	PO BOX 9023418, SAN JUAN, PR 00902-3418	\$	83,530.43
LOPEZ VALENTIN, JOSE R.	CALLE POSEIDON #347, URB. MONTE OLIVO GUAYAMA, PR 00784	\$	43,821.22
LÓPEZ VALENTÍN, JOSÉ R.		\$	31,347.08
LÓPEZ VARGAS, LUIS A.	CALLE N. SERRANO #2431, PARC. NUEVA VIDA PONCE, PR 00728	\$	25,105.00
LOYOLA TORRES, JESÚS	HC - 2 BUZON #6136, PENUELAS, PR 00624	\$	19,729.33
LOZACA GONZALEZ, EDWARD	CALLE J-II-I ALTURAS DE RIO GRANDE RIO GRANDE PR 00745	\$	41,659.03
LOZACA GONZALEZ, EDWARD		\$	23,510.31
LOZADA LOZADA, VICTOR M.	HC-01 BOX 7827, BO. TEJAS LAS PIEDRAS, PR 00771	\$	27,820.42
LOZADA RODRÍGUEZ, MARTA	CARRION MADURO 859, PDA. 22 SANTURCE, PR 00909	\$	37,873.74
LOZANO ADORNO, MARIA DEL CARMEN.	URB. VILLA DEL CANEY CALLE OROCOVIS K-10-A	\$	49,906.73
LOZANO ADORNO, MARIA DEL CARMEN.	URB. TRUJILLO ALTO, PR 00976	\$	31,347.08
LUCCIONI REYES, PEDRO P.	HC-01 BUXON 11085	\$	7,126.98
LUGO ALVAREZ, ELSIE E.	BO. GUAYABO, CALLE POMAROSA #37	\$	33,474.80
LUGO ÁLVAREZ, ELSIE E.	ISABELA, P.R. 00662	\$	23,510.31
LUGO LUGO, JOSE R.		\$	46,133.16
LUCO SERRANO, LUIS M.	APARTAMENTO #272, SABANA HOYOS, PR 00668	\$	880.21
LUYANDO CARMONA, DAVID		\$	26,184.85
MADERA BÓRRERO, ANNA R.	HC-4 BOX 6836, Y ABUCOA, P.R. 00767	\$	782.41
MALARET PAGAN, WILLIAM	COND VIZCAYA 200 CALLE 535, APT. 225 CAROLINA, PR 00985	\$	32,116.41
MALDONADO HERNANDEZ, ANTONIA	CALLE ARISTIDES DE CHAVIER #115 APT. B-2 URB. FRONTERAS BAYAMON, PR 00961	\$	84,707.91
MANGUAL RODRÍGUEZ, ERNESTO	PO BOX 1303, AÑASCO, PR 00610	\$	11,187.36
MARQUEZ FELICIANO, MARIA M.	EDIF. #115 APT. 2155	\$	56,856.34

*This amount
wages that
were unpaid,
but worked*

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Envelope Page 1 of 1





T 718.384.8040
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E projects@targemtranslations.com
A 185 Clymer St. Brooklyn, NY 11211

TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 178186 ECF No. 16345**

Signed this 17th day of August 2021



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor'.

Andreea I. Boscor

